

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

|                            |   |                   |
|----------------------------|---|-------------------|
| IN RE:                     | § |                   |
|                            | § |                   |
| ROBERT AND SHANNON MILLER, | § | CASE NO. 17-41681 |
|                            | § | (Chapter 7)       |
| DEBTORS                    | § |                   |

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned hereby appears as counsel for Christopher J. Moser, Chapter 7 Trustee (“Trustee”) and, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017, 9007 and 9010, and 11 U.S.C. §§ 342(a) and 1109(b), request that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statements and plans of reorganization, or other documents filed or entered in this case be transmitted to:

Hudson M. Jobe  
Quilling, Selander, Lownds, Winslett & Moser, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
(214) 871-2100 – Telephone  
(214) 871-2111 – Facsimile  
Email: [hjobe@qslwm.com](mailto:hjobe@qslwm.com)

**PLEASE TAKE FURTHER NOTICE** that demand is also made that the undersigned be added to the Notice List for notice of all contested matters, adversary proceedings, and other proceedings in this chapter 7 case.

**PLEASE TAKE FURTHER NOTICE** that neither this Request for Notice nor any subsequent appearances, pleadings, claims, proofs of claim, documents, suits, motions nor any other writings or conduct, shall constitute a waiver of Trustee:

a. right to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court Judge;

b. right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private right, or in any case, controversy or proceeding related hereto, notwithstanding the designation *vel non* of such matters as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2)(H), and whether or not such jury trial right is pursuant to statute or the United States Constitution;

c. right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

d. other rights, claims, actions, defenses, setoffs, recoupments or other matters to which Trustee is rightly entitled under any agreements or at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved unto Trustee without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: September 19, 2017  
Dallas, Texas

Respectfully submitted,

QUILLING, SELANDER, LOWNDS,  
WINSLETT & MOSER, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
(214) 871-2100 (Telephone)  
(214) 871-2111 (Facsimile)

By: /s/ Hudson M. Jobe  
Hudson M. Jobe  
State Bar No. 24041189

ATTORNEYS FOR TRUSTEE

### **CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing was served upon the counsel and parties of record, electronically through the Bankruptcy Court’s Electronic Case Filing System on those parties that have consented to such service on this 19<sup>th</sup> day of September, 2017.

/s/ Hudson M. Jobe